

## DETROIT LAND BANK AUTHORITY

### BOARD OF DIRECTORS CONFLICT OF INTEREST POLICY STATEMENT

**Purpose:** The purpose of this statement is to confirm the policy of the Detroit Land Bank Authority (“DLBA”) pertaining to conflict of interest. This policy is stated in Article XI, Section 11.1 of the DLBA’s Second Amended and Restated Bylaws. This statement is issued to guide the board members and employees of the DLBA in the conduct of their duties and assist them in avoiding action in conflict with maintaining the public trust and confidence.

Michigan Public Act 317 of 1968, as amended, being MCL 15.321, et seq. (P.A. 317) sets forth rules governing the conduct of public servants concerning governmental decisions and contracts with public entities, such as the DLBA. P.A. 317 also provides procedures for an individual serving a public entity for making a disclosure of direct or indirect interests in certain contracts. Additionally, P.A. 317 establishes procedures for a public entity to approve a contract in circumstances when an individual serving the public entity may, directly or indirectly, have an interest in the contract. The rules of P.A. 317 apply to a “public entity,” which is defined in a broad manner to include the DLBA. This Conflict of Interest Policy Statement (Policy) is intended to embrace procedures that are consistent with the requirements of P.A. 317.

Under P.A. 317, a conflict of interest does not exist when a public entity enters into a contract with another public entity, such as the City of Detroit or any public authority or public agency established for the benefit of or to work with the City of Detroit. This Policy should not be construed to prohibit the DLBA from entering into a contract with the City of Detroit or from any board member that has a relationship with the City of Detroit which may otherwise create a conflict under this Policy from participating in such decisions by the DLBA.

The DLBA is a Michigan public body corporate organized pursuant to the Michigan Land Bank Fast Track Act, 2003 Mich. Pub. Acts 258, Mich. Comp. Laws. §§ 124.751 – 124.774 in 2008 and an Intergovernmental Agreement between the City of Detroit and the Michigan Land Bank Fast Track Authority. The Intergovernmental Agreement, and accordingly, the DLBA’s Second Amended and Restated Bylaws provide that all board members are appointed by the Mayor, with approval of the City Council, and by the Executive Director of the Michigan State Housing Development Authority. For the purposes of this Policy, a conflict does not exist solely because a board member has a relationship as an employee or official of the City of Detroit. Accordingly, this Policy should not be construed to prohibit the DLBA from, among other things, entering into contracts with, receiving contributions from, making contributions to, or otherwise supporting or receiving support from the City of Detroit or to prohibit any board member from participating in any decisions of the DLBA pertaining to the City of Detroit.

**Scope:** This statement of Policy pertains to all members of the DLBA’s Board of Directors.

**Policy:** Board members shall conduct their duties in a manner which is consistent at all times with

maintaining the public trust and confidence. All decisions of each board member are only to be made on the basis of a desire to promote the best interests of the citizens of the City of Detroit. Board members shall be prohibited from participating in matters that affect their personal or financial interests.

**Disclosure:** In the event a board member must consider or act upon a transaction on behalf of the DLBA which involves: (a) a board member or a member of their *i m m e d i a t e* family (*spouse, domestic partner, parent, sibling, child, or individual(s) living in board member's household*) or (b) an organization with which a board member is affiliated, such board member, at the first knowledge of the transaction, shall fully disclose to the DLBA's board chairperson the precise nature of the interest or involvement.

Disclosure is also required by all board members concerning all relationships and business affiliations that could foreseeably give rise to a conflict of interest, or which may create the appearance of a conflict or present a duality of interests where the disclosing party is affiliated with another nonprofit or for-profit entity in the community in which the DLBA conducts business. For the purpose of this Policy, "affiliation" is understood to exist if the board member, or a member of his or her immediate family: (a) is an owner, shareholder, director, trustee, officer, partner, employee or agent of such organization or formerly occupied any of the foregoing positions; or (b) has any other direct or indirect dealings with such organization from which he or she knowingly receives or expects to receive economic benefit.

Board members shall disclose the identity of any member of their immediate family employed by the DLBA or who is making application to the DLBA for employment.

All disclosures required under this Policy shall be made in writing and shall be retained by the board chairperson who shall be responsible for the administration of this Policy. Matters under the administration of this Policy shall be referred to the board chairperson.

**Restraint of Participation:** If a board member has a conflict of interest in any matter before the Board of Directors, such person shall refrain from participating in deliberations or decisions relating to the proposed transaction. No board member having a conflict of interest shall vote on any matter relating to the transaction nor should such person be present at the deliberations or the vote of such matter.

Any board member who is uncertain about possible conflict of interest in any matter, may request the Board of Directors to determine whether a possible conflict exists; the Board shall resolve the question by majority vote. When possible, the question of potential conflict should be referred to counsel for an opinion prior to the vote of the Board.

**Confidentiality:** Board members may not disclose, divulge, or make accessible confidential information belonging to, or obtained through their affiliation with the DLBA to any person or entity, including relatives, friends, and business and professional associates, other than to those who have a legitimate need for such information and to whom the DLBA has authorized disclosure. Board members shall use confidential information solely for the purpose of performing services for the DLBA. This Policy is not intended to prevent disclosure where

disclosure is required by law.

**Reporting and Enforcement:** All board members have an obligation to report concerns or suspected violations of this Policy. All concerns or suspected violations shall be reported to the board chairperson, or in the alternative, a confidential method of reporting fraudulent activities is available by contacting Lighthouse Services, 24 hours a day, 7 days a week at 1-844-446-0004 or at [reports@lighthouse-services.com](mailto:reports@lighthouse-services.com). All reports will be promptly investigated.

**Interpretation:** This Policy shall be interpreted in conjunction with the applicable provisions of the DLBA's Second Amended and Restated Bylaws.

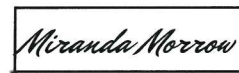
A copy of this Policy shall be given to each board member upon commencement of their relationship with the DLBA or upon the official adoption of this Policy. Each board member shall sign and date the Policy at the beginning of their term of service and each year thereafter. Failure to sign does not nullify this Policy.

Miranda Morrow-Bartell

Board member

Name (Please Print)

Title

 dotloop verified  
10/21/19 10:49 AM EDT  
REVf-2E5W-HUj0-E3GE

Signature

10/21/2019

Date



**DETROIT LAND BANK AUTHORITY**  
**CONFLICT OF INTEREST**  
**DISCLOSURE STATEMENT**  
**2018-2019**

As a member of the Detroit Land Bank Authority's Board of Directors, I have read and agree to comply with the policy concerning Conflict of Interest adopted by the Board of Directors at its meeting held on December, 2017. Neither I nor members of my immediate family (*spouse, domestic partner, parent, sibling, child, or individual(s) living in my household*) have any relationships or engage in any activities of which I am aware that may place me in a position of having a conflict of interest with the Detroit Land Bank Authority, except as follows:

1. Are you, or any member of your immediate family, an owner, shareholder, director, trustee, officer, partner, employee or agent of any corporation with which the Detroit Land Bank Authority has business dealings?

YES ☐

NO ☒

If the answer to the foregoing question is YES, please list the names of such corporations, the office held and the approximate dollar amount of business involved with the Detroit Land Bank Authority during the past 12 months.

2. Do you, or does any member of your immediate family, have a financial interest in, or receive any remuneration or income from, any business organization with which the Detroit Land Bank Authority has business dealings?

YES ☐

NO ☒

If the answer to the foregoing question is YES, please supply the following information:

- A. Names of the business organizations in which such interest is held and the person(s) by whom such interest is held:
- B. Nature and amount of each financial interest, remuneration or income:

3. Did you, or any member of your immediate family receive, in the past twelve months, any gifts or loans from any source from which the Detroit Land Bank Authority buys goods or services or with which the Detroit Land Bank Authority has significant business dealings?

YES ☐

NO ☒

If the answer to the foregoing question is YES, list such gifts or loans as follows:

Name of Source

Item

Approximate Value

4. Do you, or any members of your immediate family, have an interest in real or personal property that is subject to a decision by the Detroit Land Bank Authority regarding purchase, sale, lease, improvement, or a development agreement?

YES ☐

NO ☒

If the answer to the foregoing question is YES, please supply the following information:

A. Type of interest held and the person(s) by whom such interest is held:

B. Nature and amount of each financial interest:

C. Nature of decision(s) contemplated by the Detroit Land Bank Authority regarding each interest:

5. Are any members of your immediate family employed by, or seeking employment with, the Detroit Land Bank Authority?

YES ☐

NO ☒

If the answer to the foregoing question is YES, please supply the following information:

Name of Individual

Date Hired (If Applicable)

Organizational Title (Sought)

6. The following are other matters not listed in one of the categories above, but which in the interest of avoiding both actual impropriety and the appearance of impropriety, I feel it appropriate to disclose:

NONE ☒

I hereby agree to report promptly to the Board Chairperson of the Detroit Land Bank Authority any other conflict of interest situation of which I may become aware, subsequent to the date of this Disclosure statement.

Miranda Morrow-Bartell

Name (Please Print)

*Miranda Morrow*

dotloop verified  
10/21/19 10:45 AM EDT  
4Y4H-EW1V-PTPK-QKMG

Signature

10/21/2019

Date

## **DETROIT LAND BANK AUTHORITY**

### **BOARD OF DIRECTORS CONFLICT OF INTEREST POLICY STATEMENT**

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disclosure is required by law.

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Patricia Pernell-Shelton  
Name (Please Print)

Vice Chair  
Title

Patricia Pernell-Shelton  
Signature

2/11/2019  
Date

## DETROIT LAND BANK AUTHORITY

### CONFLICT OF INTEREST DISCLOSURE STATEMENT 2018-2019

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1. Are you, or any member of your immediate family, an owner, shareholder, director, trustee, officer, partner, employee or agent of any corporation with which the Detroit Land Bank Authority has business dealings?

YES ☐

NO ☒

If the answer to the foregoing question is YES, please list the names of such corporations, the office held and the approximate dollar amount of business involved with the Detroit Land Bank Authority during the past 12 months.

2. Do you, or does any member of your immediate family, have a financial interest in, or receive any remuneration or income from, any business organization with which the Detroit Land Bank Authority has business dealings?

YES ☐

NO ☒

If the answer to the foregoing question is YES, please supply the following information:

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3. Did you, or any member of your immediate family receive, in the past twelve months, any gifts or loans from any source from which the Detroit Land Bank Authority buys goods or services or with which the Detroit Land Bank Authority has significant business dealings?

YES ☐

NO ☒

If the answer to the foregoing question is YES, list such gifts or loans as follows:

Name of Source

Item

Approximate Value

4. Do you, or any members of your immediate family, have an interest in real or personal property that is subject to a decision by the Detroit Land Bank Authority regarding purchase, sale, lease, improvement, or a development agreement?

YES ☐

NO ☒

If the answer to the foregoing question is YES, please supply the following information:

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YES ☐

NO ☒

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NONE ☒

I hereby agree to report promptly to the Board Chairperson of the Detroit Land Bank Authority any other conflict of interest situation of which I may become aware, subsequent to the date of this Disclosure statement.

Patricia Pernell-Shelton

Name (Please Print)

Patricia Pernell-Shelton

Signature

2/11/2018

Date



Patricia  
P.S.

## **DETROIT LAND BANK AUTHORITY**

### **BOARD OF DIRECTORS CONFLICT OF INTEREST POLICY STATEMENT**

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Patricia Fernell-Shelton  
Name (Please Print)

DLBA  
Board Member  
Title

Patricia Fernell-Shelton  
Signature

4/17/2018  
Date

## DETROIT LAND BANK AUTHORITY

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YES ☐

NO ☒

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NO ☒

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- A. Names of the business organizations in which such interest is held and the person(s) by whom such interest is held:
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3. Did you, or any member of your immediate family receive, in the past twelve months, any gifts or loans from any source from which the Detroit Land Bank Authority buys goods or services or with which the Detroit Land Bank Authority has significant business dealings?

YES ☐

NO ☒

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Name of Source

Item

Approximate Value

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YES ☐

NO ☒

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NONE



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Alicia Parnell-Shelton

Name (Please Print)

[Signature]

Signature

4/17/2018

Date

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**Disclosure:** In the event a board member must consider or act upon a transaction on behalf of the DLBA which involves: (a) a board member or a member of their *i m m e d i a t e* family (*spouse, domestic partner, parent, sibling, child, or individual(s) living in board member's household*) or (b) an organization with which a board member is affiliated, such board member, at the first knowledge of the transaction, shall fully disclose to the DLBA's board chairperson the precise nature of the interest or involvement.

Disclosure is also required by all board members concerning all relationships and business affiliations that could foreseeably give rise to a conflict of interest, or which may create the appearance of a conflict or present a duality of interests where the disclosing party is affiliated with another nonprofit or for-profit entity in the community in which the DLBA conducts business. For the purpose of this Policy, "affiliation" is understood to exist if the board member, or a member of his or her immediate family: (a) is an owner, shareholder, director, trustee, officer, partner, employee or agent of such organization or formerly occupied any of the forgoing positions; or (b) has any other direct or indirect dealings with such organization from which he or she knowingly receives or expects to receive economic benefit.

Board members shall disclose the identity of any member of their immediate family employed by the DLBA or who is making application to the DLBA for employment.

All disclosures required under this Policy shall be made in writing and shall be retained by the board chairperson who shall be responsible for the administration of this Policy. Matters under the administration of this Policy shall be referred to the board chairperson.

**Restraint of Participation:** If a board member has a conflict of interest in any matter before the Board of Directors, such person shall refrain from participating in deliberations or decisions relating to the proposed transaction. No board member having a conflict of interest shall vote on any matter relating to the transaction nor should such person be present at the deliberations or the vote of such matter.

Any board member who is uncertain about possible conflict of interest in any matter, may request the Board of Directors to determine whether a possible conflict exists; the Board shall resolve the question by majority vote. When possible, the question of potential conflict should be referred to counsel for an opinion prior to the vote of the Board.

**Confidentiality:** Board members may not disclose, divulge, or make accessible confidential information belonging to, or obtained through their affiliation with the DLBA to any person or entity, including relatives, friends, and business and professional associates, other than to those who have a legitimate need for such information and to whom the DLBA has authorized disclosure. Board members shall use confidential information solely for the purpose of performing services for the DLBA. This Policy is not intended to prevent disclosure where



disclosure is required by law.

**Reporting and Enforcement:** All board members have an obligation to report concerns or suspected violations of this Policy. All concerns or suspected violations shall be reported to the board chairperson, or in the alternative, a confidential method of reporting fraudulent activities is available by contacting Lighthouse Services, 24 hours a day, 7 days a week at 1-844-446-0004 or at [reports@lighthouse-services.com](mailto:reports@lighthouse-services.com). All reports will be promptly investigated.

**Interpretation:** This Policy shall be interpreted in conjunction with the applicable provisions of the DLBA's Second Amended and Restated Bylaws.

A copy of this Policy shall be given to each board member upon commencement of their relationship with the DLBA or upon the official adoption of this Policy. Each board member shall sign and date the Policy at the beginning of their term of service and each year thereafter. Failure to sign does not nullify this Policy.

RICHARD HOSEY  
Name (Please Print)

BOARD MEMBER/TREASURER  
Title

[Signature]  
Signature

3/1/19  
Date

## DETROIT LAND BANK AUTHORITY

### CONFLICT OF INTEREST DISCLOSURE STATEMENT 2018-2019

As a member of the Detroit Land Bank Authority's Board of Directors, I have read and agree to comply with the policy concerning Conflict of Interest adopted by the Board of Directors at its meeting held on December, 2017. Neither I nor members of my immediate family (*spouse, domestic partner, parent, sibling, child, or individual(s) living in my household*) have any relationships or engage in any activities of which I am aware that may place me in a position of having a conflict of interest with the Detroit Land Bank Authority, except as follows:

1. Are you, or any member of your immediate family, an owner, shareholder, director, trustee, officer, partner, employee or agent of any corporation with which the Detroit Land Bank Authority has business dealings?

YES ☒

NO ☐

If the answer to the foregoing question is YES, please list the names of such corporations, the office held and the approximate dollar amount of business involved with the Detroit Land Bank Authority during the past 12 months.

BOARD PRESIDENT - DETROIT HOUSING COMMISSION

2. Do you, or does any member of your immediate family, have a financial interest in, or receive any remuneration or income from, any business organization with which the Detroit Land Bank Authority has business dealings?

YES ☐

NO ☒

If the answer to the foregoing question is YES, please supply the following information:

- A. Names of the business organizations in which such interest is held and the person(s) by whom such interest is held:
- B. Nature and amount of each financial interest, remuneration or income:

3. Did you, or any member of your immediate family receive, in the past twelve months, any gifts or loans from any source from which the Detroit Land Bank Authority buys goods or services or with which the Detroit Land Bank Authority has significant business dealings?

YES ☐

NO ☒

If the answer to the foregoing question is YES, list such gifts or loans as follows:

Name of Source

Item

Approximate Value

4. Do you, or any members of your immediate family, have an interest in real or personal property that is subject to a decision by the Detroit Land Bank Authority regarding purchase, sale, lease, improvement, or a development agreement?

YES ☐

NO ☒

If the answer to the foregoing question is YES, please supply the following information:

A. Type of interest held and the person(s) by whom such interest is held:

B. Nature and amount of each financial interest:

C. Nature of decision(s) contemplated by the Detroit Land Bank Authority regarding each interest:

5. Are any members of your immediate family employed by, or seeking employment with, the Detroit Land Bank Authority?

YES ☐

NO ☒

If the answer to the foregoing question is YES, please supply the following information:

Name of Individual

Date Hired (If Applicable)

Organizational Title (Sought)

6. The following are other matters not listed in one of the categories above, but which in the interest of avoiding both actual impropriety and the appearance of impropriety, I feel it appropriate to disclose:

NONE ☒

I hereby agree to report promptly to the Board Chairperson of the Detroit Land Bank Authority any other conflict of interest situation of which I may become aware, subsequent to the date of this Disclosure statement.

RICHARD HOSEY  
Name (Please Print)

[Signature]  
Signature

3/1/19  
Date



## **DETROIT LAND BANK AUTHORITY**

### **BOARD OF DIRECTORS CONFLICT OF INTEREST POLICY STATEMENT**

**Purpose:** The purpose of this statement is to confirm the policy of the Detroit Land Bank Authority ("DLBA") pertaining to conflict of interest. This policy is stated in Article XI, Section 11.1 of the DLBA's Second Amended and Restated Bylaws. This statement is issued to guide the board members and employees of the DLBA in the conduct of their duties and assist them in avoiding action in conflict with maintaining the public trust and confidence.

Michigan Public Act 317 of 1968, as amended, being MCL 15.321, et seq. (P.A. 317) sets forth rules governing the conduct of public servants concerning governmental decisions and contracts with public entities, such as the DLBA. P.A. 317 also provides procedures for an individual serving a public entity for making a disclosure of direct or indirect interests in certain contracts. Additionally, P.A. 317 establishes procedures for a public entity to approve a contract in circumstances when an individual serving the public entity may, directly or indirectly, have an interest in the contract. The rules of P.A. 317 apply to a "public entity," which is defined in a broad manner to include the DLBA. This Conflict of Interest Policy Statement (Policy) is intended to embrace procedures that are consistent with the requirements of P.A. 317.

Under P.A. 317, a conflict of interest does not exist when a public entity enters into a contract with another public entity, such as the City of Detroit or any public authority or public agency established for the benefit of or to work with the City of Detroit. This Policy should not be construed to prohibit the DLBA from entering into a contract with the City of Detroit or from any board member that has a relationship with the City of Detroit which may otherwise create a conflict under this Policy from participating in such decisions by the DLBA.

The DLBA is a Michigan public body corporate organized pursuant to the Michigan Land Bank Fast Track Act, 2003 Mich. Pub. Acts 258, Mich. Comp. Laws. §§ 124.751 – 124.774 in 2008 and an Intergovernmental Agreement between the City of Detroit and the Michigan Land Bank Fast Track Authority. The Intergovernmental Agreement, and accordingly, the DLBA's Second Amended and Restated Bylaws provide that all board members are appointed by the Mayor, with approval of the City Council, and by the Executive Director of the Michigan State Housing Development Authority. For the purposes of this Policy, a conflict does not exist solely because a board member has a relationship as an employee or official of the City of Detroit. Accordingly, this Policy should not be construed to prohibit the DLBA from, among other things, entering into contracts with, receiving contributions from, making contributions to, or otherwise supporting or receiving support from the City of Detroit or to prohibit any board member from participating in any decisions of the DLBA pertaining to the City of Detroit.

**Scope:** This statement of Policy pertains to all members of the DLBA's Board of Directors.

**Policy:** Board members shall conduct their duties in a manner which is consistent at all times with

maintaining the public trust and confidence. All decisions of each board member are only to be made on the basis of a desire to promote the best interests of the citizens of the City of Detroit. Board members shall be prohibited from participating in matters that affect their personal or financial interests.

**Disclosure:** In the event a board member must consider or act upon a transaction on behalf of the DLBA which involves: (a) a board member or a member of their *i m m e d i a t e* family (*spouse, domestic partner, parent, sibling, child, or individual(s) living in board member's household*) or (b) an organization with which a board member is affiliated, such board member, at the first knowledge of the transaction, shall fully disclose to the DLBA's board chairperson the precise nature of the interest or involvement.

Disclosure is also required by all board members concerning all relationships and business affiliations that could foreseeably give rise to a conflict of interest, or which may create the appearance of a conflict or present a duality of interests where the disclosing party is affiliated with another nonprofit or for-profit entity in the community in which the DLBA conducts business. For the purpose of this Policy, "affiliation" is understood to exist if the board member, or a member of his or her immediate family: (a) is an owner, shareholder, director, trustee, officer, partner, employee or agent of such organization or formerly occupied any of the forgoing positions; or (b) has any other direct or indirect dealings with such organization from which he or she knowingly receives or expects to receive economic benefit.

Board members shall disclose the identity of any member of their immediate family employed by the DLBA or who is making application to the DLBA for employment.

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**Confidentiality:** Board members may not disclose, divulge, or make accessible confidential information belonging to, or obtained through their affiliation with the DLBA to any person or entity, including relatives, friends, and business and professional associates, other than to those who have a legitimate need for such information and to whom the DLBA has authorized disclosure. Board members shall use confidential information solely for the purpose of performing services for the DLBA. This Policy is not intended to prevent disclosure where

disclosure is required by law.

**Reporting and Enforcement:** All board members have an obligation to report concerns or suspected violations of this Policy. All concerns or suspected violations shall be reported to the board chairperson, or in the alternative, a confidential method of reporting fraudulent activities is available by contacting Lighthouse Services, 24 hours a day, 7 days a week at 1-844-446-0004 or at reports@lighthouse-services.com. All reports will be promptly investigated.

**Interpretation:** This Policy shall be interpreted in conjunction with the applicable provisions of the DLBA's Second Amended and Restated Bylaws.

A copy of this Policy shall be given to each board member upon commencement of their relationship with the DLBA or upon the official adoption of this Policy. Each board member shall sign and date the Policy at the beginning of their term of service and each year thereafter. Failure to sign does not nullify this Policy.

RICHARD JAMES HOSEY II  
Name (Please Print)

BOARD VICE-CHAIR AND TREASURER  
Title

[Signature]  
Signature

7/2/18  
Date

## DETROIT LAND BANK AUTHORITY

### CONFLICT OF INTEREST DISCLOSURE STATEMENT 2017-2018

As a member of the Detroit Land Bank Authority's Board of Directors, I have read and agree to comply with the policy concerning Conflict of Interest adopted by the Board of Directors at its meeting held on December, 2017. Neither I nor members of my immediate family (*spouse, domestic partner, parent, sibling, child, or individual(s) living in my household*) have any relationships or engage in any activities of which I am aware that may place me in a position of having a conflict of interest with the Detroit Land Bank Authority, except as follows:

1. Are you, or any member of your immediate family, an owner, shareholder, director, trustee, officer, partner, employee or agent of any corporation with which the Detroit Land Bank Authority has business dealings?

YES ☐

NO ☒

If the answer to the foregoing question is YES, please list the names of such corporations, the office held and the approximate dollar amount of business involved with the Detroit Land Bank Authority during the past 12 months.

2. Do you, or does any member of your immediate family, have a financial interest in, or receive any remuneration or income from, any business organization with which the Detroit Land Bank Authority has business dealings?

YES ☐

NO ☒

If the answer to the foregoing question is YES, please supply the following information:

- A. Names of the business organizations in which such interest is held and the person(s) by whom such interest is held:
- B. Nature and amount of each financial interest, remuneration or income:

3. Did you, or any member of your immediate family receive, in the past twelve months, any gifts or loans from any source from which the Detroit Land Bank Authority buys goods or services or with which the Detroit Land Bank Authority has significant business dealings?

YES ☐

NO ☒

If the answer to the foregoing question is YES, list such gifts or loans as follows:

Name of Source

Item

Approximate Value

4. Do you, or any members of your immediate family, have an interest in real or personal property that is subject to a decision by the Detroit Land Bank Authority regarding purchase, sale, lease, improvement, or a development agreement?

YES ☐

NO ☒

If the answer to the foregoing question is YES, please supply the following information:

A. Type of interest held and the person(s) by whom such interest is held:

B. Nature and amount of each financial interest:

C. Nature of decision(s) contemplated by the Detroit Land Bank Authority regarding each interest:

5. Are any members of your immediate family employed by, or seeking employment with, the Detroit Land Bank Authority?

YES ☐

NO ☒

If the answer to the foregoing question is YES, please supply the following information:

Name of Individual

Date Hired (If Applicable)

Organizational Title (Sought)



6. The following are other matters not listed in one of the categories above, but which in the interest of avoiding both actual impropriety and the appearance of impropriety, I feel it appropriate to disclose:

OUT OF AN ABUNDANCE OF CAUTION, I HAVE A BUSINESS PARTNER, JASON JONES WHO IN A SEPARATE BUSINESS IN WHICH I HAVE NO INTEREST DEVELOPS ON BEHALF OF OUR COMMUNITY PARTNER, U-SNAR-BACK.

NONE ☐ ALSO, AS I HAVE PREVIOUSLY DISCLOSED, I AM THE PRESIDENT OF THE DETROIT HOUSING COMMISSION BOARD WITH WHICH DLBA DOES BUSINESS

I hereby agree to report promptly to the Board Chairperson of the Detroit Land Bank Authority any other conflict of interest situation of which I may become aware, subsequent to the date of this Disclosure Statement.

RICHARD JAMES HOSELY II  
Name (Please Print)

  
Signature

1/8/18  
Date

## DETROIT LAND BANK AUTHORITY

### CONFLICT OF INTEREST DISCLOSURE STATEMENT 2017-2018

As a member of the Detroit Land Bank Authority's Board of Directors, I have read and agree to comply with the policy concerning Conflict of Interest adopted by the Board of Directors at its meeting held on \_\_\_\_\_, 2017. Neither I nor members of my immediate family (*spouse, domestic partner, parent, sibling, child, or individual(s) living in my household*) have any relationships or engage in any activities of which I am aware that may place me in a position of having a conflict of interest with the Detroit Land Bank Authority, except as follows:

1. Are you, or any member of your immediate family, an owner, shareholder, director, trustee, officer, partner, employee or agent of any corporation with which the Detroit Land Bank Authority has business dealings?

YES ☐

NO ☒

If the answer to the foregoing question is YES, please list the names of such corporations, the office held and the approximate dollar amount of business involved with the Detroit Land Bank Authority during the past 12 months.

2. Do you, or does any member of your immediate family, have a financial interest in, or receive any remuneration or income from, any business organization with which the Detroit Land Bank Authority has business dealings?

YES ☐

NO ☒

If the answer to the foregoing question is YES, please supply the following information:

- A. Names of the business organizations in which such interest is held and the person(s) by whom such interest is held:

- B. Nature and amount of each financial interest, remuneration or income:



3. Did you, or any member of your immediate family receive, in the past twelve months, any gifts or loans from any source from which the Detroit Land Bank Authority buys goods or services or with which the Detroit Land Bank Authority has significant business dealings?

YES ☐

NO ☒

If the answer to the foregoing question is YES, list such gifts or loans as follows:

<u>Name of Source</u>	<u>Item</u>	<u>Approximate Value</u>
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4. Do you, or any members of your immediate family, have an interest in real or personal property that is subject to a decision by the Detroit Land Bank Authority regarding purchase, sale, lease, improvement, or a development agreement?

YES ☐

NO ☒

If the answer to the foregoing question is YES, please supply the following information:

- A. Type of interest held and the person(s) by whom such interest is held:
- B. Nature and amount of each financial interest:
- C. Nature of decision(s) contemplated by the Detroit Land Bank Authority regarding each interest:

5. Are any members of your immediate family employed by, or seeking employment with, the Detroit Land Bank Authority?

YES ☐

NO ☒

If the answer to the foregoing question is YES, please supply the following information:

<u>Name of Individual</u>	<u>Date Hired (If Applicable)</u>	<u>Organizational Title (Sought)</u>
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6. The following are other matters not listed in one of the categories above, but which in the interest of avoiding both actual impropriety and the appearance of impropriety, I feel it appropriate to disclose:

NONE ☒

I hereby agree to report promptly to the Board Chairperson of the Detroit Land Bank Authority any other conflict of interest situation of which I may become aware, subsequent to the date of this Disclosure Statement.

Rasul M. Raheem  
Name (Please Print)

  
Signature

1/9/18  
Date

## **DETROIT LAND BANK AUTHORITY**

### **BOARD OF DIRECTORS CONFLICT OF INTEREST POLICY STATEMENT**

**Purpose:** The purpose of this statement is to confirm the policy of the Detroit Land Bank Authority ("DLBA") pertaining to conflict of interest. This policy is stated in Article XI, Section 11.1 of the DLBA's Second Amended and Restated Bylaws. This statement is issued to guide the board members and employees of the DLBA in the conduct of their duties and assist them in avoiding action in conflict with maintaining the public trust and confidence.

Michigan Public Act 317 of 1968, as amended, being MCL 15.321, et seq. (P.A. 317) sets forth rules governing the conduct of public servants concerning governmental decisions and contracts with public entities, such as the DLBA. P.A. 317 also provides procedures for an individual serving a public entity for making a disclosure of direct or indirect interests in certain contracts. Additionally, P.A. 317 establishes procedures for a public entity to approve a contract in circumstances when an individual serving the public entity may, directly or indirectly, have an interest in the contract. The rules of P.A. 317 apply to a "public entity," which is defined in a broad manner to include the DLBA. This Conflict of Interest Policy Statement (Policy) is intended to embrace procedures that are consistent with the requirements of P.A. 317.

Under P.A. 317, a conflict of interest does not exist when a public entity enters into a contract with another public entity, such as the City of Detroit or any public authority or public agency established for the benefit of or to work with the City of Detroit. This Policy should not be construed to prohibit the DLBA from entering into a contract with the City of Detroit or from any board member that has a relationship with the City of Detroit which may otherwise create a conflict under this Policy from participating in such decisions by the DLBA.

The DLBA is a Michigan public body corporate organized pursuant to the Michigan Land Bank Fast Track Act, 2003 Mich. Pub. Acts 258, Mich. Comp. Laws. §§ 124.751 – 124.774 in 2008 and an Intergovernmental Agreement between the City of Detroit and the Michigan Land Bank Fast Track Authority. The Intergovernmental Agreement, and accordingly, the DLBA's Second Amended and Restated Bylaws provide that all board members are appointed by the Mayor, with approval of the City Council, and by the Executive Director of the Michigan State Housing Development Authority. For the purposes of this Policy, a conflict does not exist solely because a board member has a relationship as an employee or official of the City of Detroit. Accordingly, this Policy should not be construed to prohibit the DLBA from, among other things, entering into contracts with, receiving contributions from, making contributions to, or otherwise supporting or receiving support from the City of Detroit or to prohibit any board member from participating in any decisions of the DLBA pertaining to the City of Detroit.

**Scope:** This statement of Policy pertains to all members of the DLBA's Board of Directors.

**Policy:** Board members shall conduct their duties in a manner which is consistent at all times with

maintaining the public trust and confidence. All decisions of each board member are only to be made on the basis of a desire to promote the best interests of the citizens of the City of Detroit. Board members shall be prohibited from participating in matters that affect their personal or financial interests.

**Disclosure:** In the event a board member must consider or act upon a transaction on behalf of the DLBA which involves: (a) a board member or a member of their *i m m e d i a t e* family (*spouse, domestic partner, parent, sibling, child, or individual(s) living in board member's household*) or (b) an organization with which a board member is affiliated, such board member, at the first knowledge of the transaction, shall fully disclose to the DLBA's board chairperson the precise nature of the interest or involvement.

Disclosure is also required by all board members concerning all relationships and business affiliations that could foreseeably give rise to a conflict of interest, or which may create the appearance of a conflict or present a duality of interests where the disclosing party is affiliated with another nonprofit or for-profit entity in the community in which the DLBA conducts business. For the purpose of this Policy, "affiliation" is understood to exist if the board member, or a member of his or her immediate family: (a) is an owner, shareholder, director, trustee, officer, partner, employee or agent of such organization or formerly occupied any of the forgoing positions; or (b) has any other direct or indirect dealings with such organization from which he or she knowingly receives or expects to receive economic benefit.

Board members shall disclose the identity of any member of their immediate family employed by the DLBA or who is making application to the DLBA for employment.

All disclosures required under this Policy shall be made in writing and shall be retained by the board chairperson who shall be responsible for the administration of this Policy. Matters under the administration of this Policy shall be referred to the board chairperson.

**Restraint of Participation:** If a board member has a conflict of interest in any matter before the Board of Directors, such person shall refrain from participating in deliberations or decisions relating to the proposed transaction. No board member having a conflict of interest shall vote on any matter relating to the transaction nor should such person be present at the deliberations or the vote of such matter.

Any board member who is uncertain about possible conflict of interest in any matter, may request the Board of Directors to determine whether a possible conflict exists; the Board shall resolve the question by majority vote. When possible, the question of potential conflict should be referred to counsel for an opinion prior to the vote of the Board.

**Confidentiality:** Board members may not disclose, divulge, or make accessible confidential information belonging to, or obtained through their affiliation with the DLBA to any person or entity, including relatives, friends, and business and professional associates, other than to those who have a legitimate need for such information and to whom the DLBA has authorized disclosure. Board members shall use confidential information solely for the purpose of performing services for the DLBA. This Policy is not intended to prevent disclosure where

disclosure is required by law.


**Reporting and Enforcement:** All board members have an obligation to report concerns or suspected violations of this Policy. All concerns or suspected violations shall be reported to the board chairperson, or in the alternative, a confidential method of reporting fraudulent activities is available by contacting Lighthouse Services, 24 hours a day, 7 days a week at 1-844-446-0004 or at [reports@lighthouse-services.com](mailto:reports@lighthouse-services.com). All reports will be promptly investigated.

**Interpretation:** This Policy shall be interpreted in conjunction with the applicable provisions of the DLBA's Second Amended and Restated Bylaws.

A copy of this Policy shall be given to each board member upon commencement of their relationship with the DLBA or upon the official adoption of this Policy. Each board member shall sign and date the Policy at the beginning of their term of service and each year thereafter. Failure to sign does not nullify this Policy.

CAROL A. WALTERS  
Name (Please Print)

BOARD MEMBER  
Title

  
Signature

2-11-19  
Date

**DETROIT LAND BANK AUTHORITY**

**CONFLICT OF INTEREST  
DISCLOSURE STATEMENT  
2018-2019**

As a member of the Detroit Land Bank Authority's Board of Directors, I have read and agree to comply with the policy concerning Conflict of Interest adopted by the Board of Directors at its meeting held on December, 2017. Neither I nor members of my immediate family (*spouse, domestic partner, parent, sibling, child, or individual(s) living in my household*) have any relationships or engage in any activities of which I am aware that may place me in a position of having a conflict of interest with the Detroit Land Bank Authority, except as follows:

1. Are you, or any member of your immediate family, an owner, shareholder, director, trustee, officer, partner, employee or agent of any corporation with which the Detroit Land Bank Authority has business dealings?

YES ☐

NO ☒

If the answer to the foregoing question is YES, please list the names of such corporations, the office held and the approximate dollar amount of business involved with the Detroit Land Bank Authority during the past 12 months.

2. Do you, or does any member of your immediate family, have a financial interest in, or receive any remuneration or income from, any business organization with which the Detroit Land Bank Authority has business dealings?

YES ☐

NO ☒

If the answer to the foregoing question is YES, please supply the following information:

A. Names of the business organizations in which such interest is held and the person(s) by whom such interest is held:

B. Nature and amount of each financial interest, remuneration or income:

3. Did you, or any member of your immediate family receive, in the past twelve months, any gifts or loans from any source from which the Detroit Land Bank Authority buys goods or services or with which the Detroit Land Bank Authority has significant business dealings?

YES ☐

NO ☒

If the answer to the foregoing question is YES, list such gifts or loans as follows:

Name of Source

Item

Approximate Value

4. Do you, or any members of your immediate family, have an interest in real or personal property that is subject to a decision by the Detroit Land Bank Authority regarding purchase, sale, lease, improvement, or a development agreement?

YES ☐

NO ☒

If the answer to the foregoing question is YES, please supply the following information:

- A. Type of interest held and the person(s) by whom such interest is held:
- B. Nature and amount of each financial interest:
- C. Nature of decision(s) contemplated by the Detroit Land Bank Authority regarding each interest:

5. Are any members of your immediate family employed by, or seeking employment with, the Detroit Land Bank Authority?

YES ☐

NO ☒



If the answer to the foregoing question is YES, please supply the following information:

Name of Individual

Date Hired (If Applicable)

Organizational Title (Sought)

6. The following are other matters not listed in one of the categories above, but which in the interest of avoiding both actual impropriety and the appearance of impropriety, I feel it appropriate to disclose:

NONE ☒

I hereby agree to report promptly to the Board Chairperson of the Detroit Land Bank Authority any other conflict of interest situation of which I may become aware, subsequent to the date of this Disclosure statement.

CAROL A. WALTERS

Name (Please Print)



Signature

2-11-19

Date

## **DETROIT LAND BANK AUTHORITY**

### **BOARD OF DIRECTORS CONFLICT OF INTEREST POLICY STATEMENT**

**Purpose:** The purpose of this statement is to confirm the policy of the Detroit Land Bank Authority ("DLBA") pertaining to conflict of interest. This policy is stated in Article XI, Section 11.1 of the DLBA's Second Amended and Restated Bylaws. This statement is issued to guide the board members and employees of the DLBA in the conduct of their duties and assist them in avoiding action in conflict with maintaining the public trust and confidence.

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**Scope:** This statement of Policy pertains to all members of the DLBA's Board of Directors.

**Policy:** Board members shall conduct their duties in a manner which is consistent at all times with

maintaining the public trust and confidence. All decisions of each board member are only to be made on the basis of a desire to promote the best interests of the citizens of the City of Detroit. Board members shall be prohibited from participating in matters that affect their personal or financial interests.

**Disclosure:** In the event a board member must consider or act upon a transaction on behalf of the DLBA which involves: (a) a board member or a member of their immediate family (*spouse, domestic partner, parent, sibling, child, or individual(s) living in board member's household*) or (b) an organization with which a board member is affiliated, such board member, at the first knowledge of the transaction, shall fully disclose to the DLBA's board chairperson the precise nature of the interest or involvement.

Disclosure is also required by all board members concerning all relationships and business affiliations that could foreseeably give rise to a conflict of interest, or which may create the appearance of a conflict or present a duality of interests where the disclosing party is affiliated with another nonprofit or for-profit entity in the community in which the DLBA conducts business. For the purpose of this Policy, "affiliation" is understood to exist if the board member, or a member of his or her immediate family: (a) is an owner, shareholder, director, trustee, officer, partner, employee or agent of such organization or formerly occupied any of the forgoing positions; or (b) has any other direct or indirect dealings with such organization from which he or she knowingly receives or expects to receive economic benefit.

Board members shall disclose the identity of any member of their immediate family employed by the DLBA or who is making application to the DLBA for employment.

All disclosures required under this Policy shall be made in writing and shall be retained by the board chairperson who shall be responsible for the administration of this Policy. Matters under the administration of this Policy shall be referred to the board chairperson.

**Restraint of Participation:** If a board member has a conflict of interest in any matter before the Board of Directors, such person shall refrain from participating in deliberations or decisions relating to the proposed transaction. No board member having a conflict of interest shall vote on any matter relating to the transaction nor should such person be present at the deliberations or the vote of such matter.

Any board member who is uncertain about possible conflict of interest in any matter, may request the Board of Directors to determine whether a possible conflict exists; the Board shall resolve the question by majority vote. When possible, the question of potential conflict should be referred to counsel for an opinion prior to the vote of the Board.

**Confidentiality:** Board members may not disclose, divulge, or make accessible confidential information belonging to, or obtained through their affiliation with the DLBA to any person or entity, including relatives, friends, and business and professional associates, other than to those who have a legitimate need for such information and to whom the DLBA has authorized disclosure. Board members shall use confidential information solely for the purpose of performing services for the DLBA. This Policy is not intended to prevent disclosure where

disclosure is required by law.


**Reporting and Enforcement:** All board members have an obligation to report concerns or suspected violations of this Policy. All concerns or suspected violations shall be reported to the board chairperson, or in the alternative, a confidential method of reporting fraudulent activities is available by contacting Lighthouse Services, 24 hours a day, 7 days a week at 1-844-446-0004 or at [reports@lighthouse-services.com](mailto:reports@lighthouse-services.com). All reports will be promptly investigated.

**Interpretation:** This Policy shall be interpreted in conjunction with the applicable provisions of the DLBA's Second Amended and Restated Bylaws.

A copy of this Policy shall be given to each board member upon commencement of their relationship with the DLBA or upon the official adoption of this Policy. Each board member shall sign and date the Policy at the beginning of their term of service and each year thereafter. Failure to sign does not nullify this Policy.

CAROL A. WALKERS  
Name (Please Print)

BOARD MEMBER  
Title

  
Signature

1-10-18  
Date

## DETROIT LAND BANK AUTHORITY

### CONFLICT OF INTEREST DISCLOSURE STATEMENT 2017-2018

As a member of the Detroit Land Bank Authority's Board of Directors, I have read and agree to comply with the policy concerning Conflict of Interest adopted by the Board of Directors at its meeting held on December 2017. Neither I nor members of my immediate family (*spouse, domestic partner, parent, sibling, child, or individual(s) living in my household*) have any relationships or engage in any activities of which I am aware that may place me in a position of having a conflict of interest with the Detroit Land Bank Authority, except as follows:

1. Are you, or any member of your immediate family, an owner, shareholder, director, trustee, officer, partner, employee or agent of any corporation with which the Detroit Land Bank Authority has business dealings?

YES ☐

NO ☒

If the answer to the foregoing question is YES, please list the names of such corporations, the office held and the approximate dollar amount of business involved with the Detroit Land Bank Authority during the past 12 months.

2. Do you, or does any member of your immediate family, have a financial interest in, or receive any remuneration or income from, any business organization with which the Detroit Land Bank Authority has business dealings?

YES ☐

NO ☒

If the answer to the foregoing question is YES, please supply the following information:

- A. Names of the business organizations in which such interest is held and the person(s) by whom such interest is held:
- B. Nature and amount of each financial interest, remuneration or income:

3. Did you, or any member of your immediate family receive, in the past twelve months, any gifts or loans from any source from which the Detroit Land Bank Authority buys goods or services or with which the Detroit Land Bank Authority has significant business dealings?

YES ☐

NO ☒

If the answer to the foregoing question is YES, list such gifts or loans as follows:

Name of Source

Item

Approximate Value

4. Do you, or any members of your immediate family, have an interest in real or personal property that is subject to a decision by the Detroit Land Bank Authority regarding purchase, sale, lease, improvement, or a development agreement?

YES ☐

NO ☒

If the answer to the foregoing question is YES, please supply the following information:

A. Type of interest held and the person(s) by whom such interest is held:

B. Nature and amount of each financial interest:

C. Nature of decision(s) contemplated by the Detroit Land Bank Authority regarding each interest:

5. Are any members of your immediate family employed by, or seeking employment with, the Detroit Land Bank Authority?

YES ☐

NO ☒

If the answer to the foregoing question is YES, please supply the following information:

Name of Individual

Date Hired (If Applicable)

Organizational Title (Sought)

6. The following are other matters not listed in one of the categories above, but which in the interest of avoiding both actual impropriety and the appearance of impropriety, I feel it appropriate to disclose:

NONE ☒

I hereby agree to report promptly to the Board Chairperson of the Detroit Land Bank Authority any other conflict of interest situation of which I may become aware, subsequent to the date of this Disclosure Statement.

CAROL A. WALTERS  
Name (Please Print)

  
Signature

1 - 10 - 18  
Date



## **DETROIT LAND BANK AUTHORITY**

### **BOARD OF DIRECTORS CONFLICT OF INTEREST POLICY STATEMENT**

**Purpose:** The purpose of this statement is to confirm the policy of the Detroit Land Bank Authority ("DLBA") pertaining to conflict of interest. This policy is stated in Article XI, Section 11.1 of the DLBA's Second Amended and Restated Bylaws. This statement is issued to guide the board members and employees of the DLBA in the conduct of their duties and assist them in avoiding action in conflict with maintaining the public trust and confidence.

Michigan Public Act 317 of 1968, as amended, being MCL 15.321, et seq. (P.A. 317) sets forth rules governing the conduct of public servants concerning governmental decisions and contracts with public entities, such as the DLBA. P.A. 317 also provides procedures for an individual serving a public entity for making a disclosure of direct or indirect interests in certain contracts. Additionally, P.A. 317 establishes procedures for a public entity to approve a contract in circumstances when an individual serving the public entity may, directly or indirectly, have an interest in the contract. The rules of P.A. 317 apply to a "public entity," which is defined in a broad manner to include the DLBA. This Conflict of Interest Policy Statement (Policy) is intended to embrace procedures that are consistent with the requirements of P.A. 317.

Under P.A. 317, a conflict of interest does not exist when a public entity enters into a contract with another public entity, such as the City of Detroit or any public authority or public agency established for the benefit of or to work with the City of Detroit. This Policy should not be construed to prohibit the DLBA from entering into a contract with the City of Detroit or from any board member that has a relationship with the City of Detroit which may otherwise create a conflict under this Policy from participating in such decisions by the DLBA.

The DLBA is a Michigan public body corporate organized pursuant to the Michigan Land Bank Fast Track Act, 2003 Mich. Pub. Acts 258, Mich. Comp. Laws. §§ 124.751 – 124.774 in 2008 and an Intergovernmental Agreement between the City of Detroit and the Michigan Land Bank Fast Track Authority. The Intergovernmental Agreement, and accordingly, the DLBA's Second Amended and Restated Bylaws provide that all board members are appointed by the Mayor, with approval of the City Council, and by the Executive Director of the Michigan State Housing Development Authority. For the purposes of this Policy, a conflict does not exist solely because a board member has a relationship as an employee or official of the City of Detroit. Accordingly, this Policy should not be construed to prohibit the DLBA from, among other things, entering into contracts with, receiving contributions from, making contributions to, or otherwise supporting or receiving support from the City of Detroit or to prohibit any board member from participating in any decisions of the DLBA pertaining to the City of Detroit.

**Scope:** This statement of Policy pertains to all members of the DLBA's Board of Directors.

**Policy:** Board members shall conduct their duties in a manner which is consistent at all times with

maintaining the public trust and confidence. All decisions of each board member are only to be made on the basis of a desire to promote the best interests of the citizens of the City of Detroit. Board members shall be prohibited from participating in matters that affect their personal or financial interests.

**Disclosure:** In the event a board member must consider or act upon a transaction on behalf of the DLBA which involves: (a) a board member or a member of their immediate family (*spouse, domestic partner, parent, sibling, child, or individual(s) living in board member's household*) or (b) an organization with which a board member is affiliated, such board member, at the first knowledge of the transaction, shall fully disclose to the DLBA's board chairperson the precise nature of the interest or involvement.

Disclosure is also required by all board members concerning all relationships and business affiliations that could foreseeably give rise to a conflict of interest, or which may create the appearance of a conflict or present a duality of interests where the disclosing party is affiliated with another nonprofit or for-profit entity in the community in which the DLBA conducts business. For the purpose of this Policy, "affiliation" is understood to exist if the board member, or a member of his or her immediate family: (a) is an owner, shareholder, director, trustee, officer, partner, employee or agent of such organization or formerly occupied any of the forgoing positions; or (b) has any other direct or indirect dealings with such organization from which he or she knowingly receives or expects to receive economic benefit.

Board members shall disclose the identity of any member of their immediate family employed by the DLBA or who is making application to the DLBA for employment.

All disclosures required under this Policy shall be made in writing and shall be retained by the board chairperson who shall be responsible for the administration of this Policy. Matters under the administration of this Policy shall be referred to the board chairperson.

**Restraint of Participation:** If a board member has a conflict of interest in any matter before the Board of Directors, such person shall refrain from participating in deliberations or decisions relating to the proposed transaction. No board member having a conflict of interest shall vote on any matter relating to the transaction nor should such person be present at the deliberations or the vote of such matter.

Any board member who is uncertain about possible conflict of interest in any matter, may request the Board of Directors to determine whether a possible conflict exists; the Board shall resolve the question by majority vote. When possible, the question of potential conflict should be referred to counsel for an opinion prior to the vote of the Board.

**Confidentiality:** Board members may not disclose, divulge, or make accessible confidential information belonging to, or obtained through their affiliation with the DLBA to any person or entity, including relatives, friends, and business and professional associates, other than to those who have a legitimate need for such information and to whom the DLBA has authorized disclosure. Board members shall use confidential information solely for the purpose of performing services for the DLBA. This Policy is not intended to prevent disclosure where

disclosure is required by law.

**Reporting and Enforcement:** All board members have an obligation to report concerns or suspected violations of this Policy. All concerns or suspected violations shall be reported to the board chairperson, or in the alternative, a confidential method of reporting fraudulent activities is available by contacting Lighthouse Services, 24 hours a day, 7 days a week at 1-844-446-0004 or at [reports@lighthouse-services.com](mailto:reports@lighthouse-services.com). All reports will be promptly investigated.

**Interpretation:** This Policy shall be interpreted in conjunction with the applicable provisions of the DLBA's Second Amended and Restated Bylaws.

A copy of this Policy shall be given to each board member upon commencement of their relationship with the DLBA or upon the official adoption of this Policy. Each board member shall sign and date the Policy at the beginning of their term of service and each year thereafter. Failure to sign does not nullify this Policy.

Erica Ward Gerson  
Name (Please Print)

Chair of the Board  
Title

Erica Ward Gerson  
Signature

1/8/18  
Date

## DETROIT LAND BANK AUTHORITY

### CONFLICT OF INTEREST DISCLOSURE STATEMENT

2017-2018

As a member of the Detroit Land Bank Authority's Board of Directors, I have read and agree to comply with the policy concerning Conflict of Interest adopted by the Board of Directors at its meeting held on Dec 12, 2017. Neither I nor members of my immediate family (*spouse, domestic partner, parent, sibling, child, or individual(s) living in my household*) have any relationships or engage in any activities of which I am aware that may place me in a position of having a conflict of interest with the Detroit Land Bank Authority, except as follows:

1. Are you, or any member of your immediate family, an owner, shareholder, director, trustee, officer, partner, employee or agent of any corporation with which the Detroit Land Bank Authority has business dealings?

YES ☐

NO ☒

If the answer to the foregoing question is YES, please list the names of such corporations, the office held and the approximate dollar amount of business involved with the Detroit Land Bank Authority during the past 12 months.

2. Do you, or does any member of your immediate family, have a financial interest in, or receive any remuneration or income from, any business organization with which the Detroit Land Bank Authority has business dealings?

YES ☒

NO ☐

If the answer to the foregoing question is YES, please supply the following information:

- A. Names of the business organizations in which such interest is held and the person(s) by whom such interest is held:

*We have a Bank account at JPM Chase*

- B. Nature and amount of each financial interest, remuneration or income:

*We receive interest on the deposits  
in our bank account*

3. Did you, or any member of your immediate family receive, in the past twelve months, any gifts or loans from any source from which the Detroit Land Bank Authority buys goods or services or with which the Detroit Land Bank Authority has significant business dealings?

YES ☐

NO ☒

If the answer to the foregoing question is YES, list such gifts or loans as follows:

Name of Source

Item

Approximate Value

4. Do you, or any members of your immediate family, have an interest in real or personal property that is subject to a decision by the Detroit Land Bank Authority regarding purchase, sale, lease, improvement, or a development agreement?

YES ☐

NO ☒

If the answer to the foregoing question is YES, please supply the following information:

A. Type of interest held and the person(s) by whom such interest is held:

B. Nature and amount of each financial interest:

C. Nature of decision(s) contemplated by the Detroit Land Bank Authority regarding each interest:

5. Are any members of your immediate family employed by, or seeking employment with, the Detroit Land Bank Authority?

YES ☐

NO ☒

If the answer to the foregoing question is YES, please supply the following information:

Name of Individual

Date Hired (If Applicable)

Organizational Title (Sought)

6. The following are other matters not listed in one of the categories above, but which in the interest of avoiding both actual impropriety and the appearance of impropriety, I feel it appropriate to disclose:

NONE ☒

I hereby agree to report promptly to the Board Chairperson of the Detroit Land Bank Authority any other conflict of interest situation of which I may become aware, subsequent to the date of this Disclosure Statement.

Eric Ward Gerson  
Name (Please Print)

Eric Ward Gerson  
Signature

1-8-18  
Date

## **DETROIT LAND BANK AUTHORITY**

### **BOARD OF DIRECTORS CONFLICT OF INTEREST POLICY STATEMENT**

**Purpose:** The purpose of this statement is to confirm the policy of the Detroit Land Bank Authority ("DLBA") pertaining to conflict of interest. This policy is stated in Article XI, Section 11.1 of the DLBA's Second Amended and Restated Bylaws. This statement is issued to guide the board members and employees of the DLBA in the conduct of their duties and assist them in avoiding action in conflict with maintaining the public trust and confidence.

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**Disclosure:** In the event a board member must consider or act upon a transaction on behalf of the DLBA which involves: (a) a board member or a member of their *i m m e d i a t e* family (*spouse, domestic partner, parent, sibling, child, or individual(s) living in board member's household*) or (b) an organization with which a board member is affiliated, such board member, at the first knowledge of the transaction, shall fully disclose to the DLBA's board chairperson the precise nature of the interest or involvement.

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**Interpretation:** This Policy shall be interpreted in conjunction with the applicable provisions of the DLBA's Second Amended and Restated Bylaws.

A copy of this Policy shall be given to each board member upon commencement of their relationship with the DLBA or upon the official adoption of this Policy. Each board member shall sign and date the Policy at the beginning of their term of service and each year thereafter. Failure to sign does not nullify this Policy.

Eric Ward Gerson  
Name (Please Print)

Board Member  
Title

Eric Ward Gerson  
Signature

2/10/19  
Date

## DETROIT LAND BANK AUTHORITY

### CONFLICT OF INTEREST DISCLOSURE STATEMENT

2018-2019

As a member of the Detroit Land Bank Authority's Board of Directors, I have read and agree to comply with the policy concerning Conflict of Interest adopted by the Board of Directors at its meeting held on December 2017. Neither I nor members of my immediate family (*spouse, domestic partner, parent, sibling, child, or individual(s) living in my household*) have any relationships or engage in any activities of which I am aware that may place me in a position of having a conflict of interest with the Detroit Land Bank Authority, except as follows:

1. Are you, or any member of your immediate family, an owner, shareholder, director, trustee, officer, partner, employee or agent of any corporation with which the Detroit Land Bank Authority has business dealings?

YES ☐

NO ☒

If the answer to the foregoing question is YES, please list the names of such corporations, the office held and the approximate dollar amount of business involved with the Detroit Land Bank Authority during the past 12 months.

2. Do you, or does any member of your immediate family, have a financial interest in, or receive any remuneration or income from, any business organization with which the Detroit Land Bank Authority has business dealings?

YES ☐

NO ☒

If the answer to the foregoing question is YES, please supply the following information:

- A. Names of the business organizations in which such interest is held and the person(s) by whom such interest is held:
- B. Nature and amount of each financial interest, remuneration or income:

3. Did you, or any member of your immediate family receive, in the past twelve months, any gifts or loans from any source from which the Detroit Land Bank Authority buys goods or services or with which the Detroit Land Bank Authority has significant business dealings?

YES ☐

NO ☒

If the answer to the foregoing question is YES, list such gifts or loans as follows:

<u>Name of Source</u>	<u>Item</u>	<u>Approximate Value</u>
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4. Do you, or any members of your immediate family, have an interest in real or personal property that is subject to a decision by the Detroit Land Bank Authority regarding purchase, sale, lease, improvement, or a development agreement?

YES ☐

NO ☒

If the answer to the foregoing question is YES, please supply the following information:

A. Type of interest held and the person(s) by whom such interest is held:

B. Nature and amount of each financial interest:

C. Nature of decision(s) contemplated by the Detroit Land Bank Authority regarding each interest:

5. Are any members of your immediate family employed by, or seeking employment with, the Detroit Land Bank Authority?

YES ☐

NO ☒

If the answer to the foregoing question is YES, please supply the following information:

<u>Name of Individual</u>	<u>Date Hired (If Applicable)</u>	<u>Organizational Title (Sought)</u>
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6. The following are other matters not listed in one of the categories above, but which in the interest of avoiding both actual impropriety and the appearance of impropriety, I feel it appropriate to disclose:

NONE ☒

I hereby agree to report promptly to the Board Chairperson of the Detroit Land Bank Authority any other conflict of interest situation of which I may become aware, subsequent to the date of this Disclosure Statement.

Eric Ward Gerson  
Name (Please Print)

Eric Ward Gerson  
Signature

2/10/19  
Date